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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CALIFORNIA**

Dustin Neff, an individual,

Plaintiff,

VS.

SBA Entertainment, LLC, a Colorado limited liability company; Goode Enterprise Solutions Inc., a Colorado corporation; and Does 1-10, inclusive,

Defendants.

) Case No.: 3:23-cv-02518-JD

FIFTH STIPULATION OF TIME TO RESPOND TO COMPLAINT

Complaint Filed: May 24, 2023

1 **IT IS HEREBY STIPULATED** by and between Plaintiff, Dustin Neff (“Plaintiff”), and
2 Defendant, Goode Enterprise Solutions Inc. (“GES”), by and through their respective counsel, that
3 pursuant to Federal Rule of Civil Procedure 6(a), and Local Rule 6-1, GES may have to and
4 including November 9, 2023, to file a responsive pleading in this matter, as the parties are engaging
5 in settlement negotiations and GES is preparing to proceed pro se in this matter. This does not alter
6 the date of any event, or any deadline already scheduled by the Court, and this is the fifth extension
7 provided by Plaintiff.

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9 Date: November 2nd, 2023.

Respectfully submitted,
/s/ Valerie A. Yanaros, Esq.
Valerie Yanaros, Esq.
Texas Bar No. 24075628
Applying to Appear Pro Hac Vice in
the Northern District Court of
California
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16 **ATTORNEY FOR DEFENDANT GES**

17 /s/ Frank R. Trechsel, Esq.
Scott Alan Burroughs, Esq.
Frank R. Trechsel, Esq.
DONIGER/BURROUGHS

19 **ATTORNEYS FOR PLAINTIFF**

20 **ATTESTATION**

21
22 Concurrence in the filing of this document has been obtained from each of the individual(s) whose
23 electronic signature is attributed above.

24 By_ /s/ Valerie Yanaros _____
25 Valerie Yanaros
26 Attorney for Defendant,
Goode Enterprise Solutions, Inc.

1 **IT IS SO ORDERED**, Defendant, GES, shall have up to and including
2 November 9, 2023, to file a responsive pleading.

3 DATE: _____

4 _____
5 United States District Court Judge
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CERTIFICATE OF SERVICE

I hereby certify that on November 2nd, 2023, the foregoing document was filed with the clerk of the court for the U.S. District Court, Northern District of California, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means, including:

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/s/ Valerie Yanaros, Esq.
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